

COMMENTS OF TELIAX, INC.
Exhibit A – Deposition Transcript of Alison Miler

TeliAx, Inc. v. AT&T Corp, 1:15-cv-01472-RBJ (D. Colo.)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
CIVIL ACTION NO.: 1:15-cv-01472-RBJ

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TELIAX, INC., d/b/a Teliix)
Colorado, LLC,)
)
Plaintiff/)
Counter-Defendant,)
)
vs.)
)
AT&T CORP.,)
)
Counter-Plaintiff/)
Defendant, and)
)
BELLSOUTH LONG DISTANCE, INC.,)
D/B/A AT&T LONG DISTANCE)
SERVICE,)
)
Defendant.)
-----X

DEPOSITION OF ALISON L. MILLER
Bedminster Township, New Jersey
Wednesday, December 2, 2015

Reported by:
CORINNE J. BLAIR, CRR, CCR, RPR, CLR
JOB No: 100685

1 Miller

2 correctly, if there was a CLEC that had a
3 dialer, and it spoofed caller ID information
4 and just dialed AT&T served toll-free numbers,
5 but there was no one to answer the call or
6 speak, that would be fraud?

7 A My understanding is, yes, that would
8 fall under our fraud.

9 Q You would expect those to be
10 blocked?

11 A We would expect whoever's sending
12 those to no longer be sending those.

13 Q Would AT&T work with Teliax to
14 identify those calls, where they might be
15 coming from?

16 A If it is possible to identify --
17 usually AT&T would note, but it would be
18 Teliax that would need to be able to tell who
19 that was coming from. We have no vision into
20 who's behind Teliax.

21 Q Okay. Besides international calls
22 not going through international gateways and
23 fraudulent spoofed calls, are there any other
24 instances where AT&T does not expect Teliax to
25 deliver 8YY calls intended for AT&T's network

1 Miller

2 to AT&T?

3 A Caveating by saying if it's a
4 legitimate domestic switched access
5 originated call, and Teliix receives that, we
6 would expect that call to be sent through the
7 proper channels to AT&T.

8 Q Would that include calls where
9 the -- you have determined that the telephone
10 number making the call is not a Teliix
11 telephone number?

12 A That call would still be routed to
13 us. What is at question is the compensation
14 for that traffic.

15 Q But you would expect those calls to
16 be delivered to AT&T?

17 A If Teliix is receiving those calls,
18 yes, we would expect those to be sent to
19 AT&T.

20 Q Are you aware of a requirement, a
21 regulatory requirement or an industry policy,
22 that requires toll-free aggregators to issue
23 telephone numbers to the wholesale customers?

24 A No.

25 Q Do you know if it's permissible for